

Fax Memo

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Date: March 6, 2009

FAX: 916-464-4645

Pages: 4 including cover

To: Diana Messina, Senior Engineer
Central Valley Region Water Quality Control Board
11020 Sun Center Dr., Ste 100
Rancho Cordova, CA 95670-6144

From: Evelyn Soltero
20405 Farrell Dr
Penn Valley, CA 94946

Memo:

Attn: Ms. Messina

RE: Donner Summit PUD Wastewater Treatment Plant Tentative Waste
Discharge Requirements and Tentative Cease and Desist Order
comments

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20405 Farrell Dr
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Diana Messina, Senior Engineer
Central Valley Region Water Quality Control Board
11020 Sun Center Drive, Suite 100
Rancho Cordova, CA 95670-6144

RE: Donner Summit PUD Wastewater Treatment Plant Tentative Waste Discharge Requirements and Tentative Cease and Desist Order comments

Dear Ms. Messina,

Please accept this letter containing comments regarding the Donner Summit PUD Tentative Waste Discharge Requirements and the Tentative Cease and Desist Order for the Donner Summit PUD Wastewater Treatment Plant. As an amateur scientist residing in Nevada County, as a concerned high school science educator, and as a South Yuba river advocate I beseech you to consider the rationale in the following comments.

Comment #1: I am certain that the Central Valley Region Water Quality Control Board is well aware that Donner Summit PUD discharges directly into an ephemeral stream (Soda Springs), not into the Cisco gage 10 miles downstream. Based upon this important distinction, I request no dilution credits for several reasons:

- a) The estimation of stream flow at the point of discharge is not actually determined from Donner Summit PUD's Soda Springs discharge point. It is based on a watershed area ratio and the Cisco gage 10 miles downstream! This is a wholly inadequate method considering the resources at stake.
- b) A request by Donner Summit PUD for dilution credits of several pollutants (on which they have yet to come into compliance) is based on irrelevant data. It should be widely known by both the Central Valley Region Water Quality Control Board and Donner Summit PUD that this dilution credit request is dependent upon the estimation of stream flow based on a watershed area ratio and the Cisco gage 10 miles downstream from Donner Summit PUD's actual discharge site into an ephemeral stream.
- c) A Flow Study should be completed and based on the installation of a stream gage, which continuously collects stream flow data under quality assurance criteria of the US Geologic Survey. This study should become requisite for any formulation of dilution credits. This is additionally important; any formulation of dilution credits must require actual stream flow data at the point of discharge to be scientifically accurate!

Diana Messina, Senior Engineer
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RE: Donner Summit PUD Wastewater Treatment Plant Tentative Waste Discharge Requirements and Tentative Cease and Desist Order comments

Comment #2: While I believe I understand the rationale for creating interim limits, the excessive length of the interim limits appear irrational, as does the logic in the extremely high interim limits set for ammonia, nitrate, aluminum, manganese, copper, cyanide, aldrin, alpha BHC, silver, and zinc, especially given Donner Summit PUD's continual non-compliance! I request that interim limits be modified in several ways:

- a) Reduce the length of any interim permits from 60 (sixty) months to 24 (twenty-four) months. A shorter time frame is ideal, for it allows for both parties, the Central Valley Region Water Quality Control Board and Donner Summit PUD, to work more closely to accomplish their mutual goals. A longer time frame may invite procrastination or miscommunication. For instance, Donner Summit PUD claimed that they cannot make improvements during interim permit stages because the Central Valley Region Water Board had not issued new limits. Donner Summit PUD must be held accountable!
- b) Re-assess the extreme interim limits for ammonia, nitrate, aluminum, manganese, copper, cyanide, aldrin, alpha BHC, silver, and zinc. (53 mg/L of allowable nitrates!!??) I do understand that these interim limits were based predominantly on samples prior to Donner Summit PUD's April 2007 upgrades. Inclusion of a larger sample size from the upgraded plant would represent a more accurate picture of Donner Summit PUD's ability to process these pollutants. This is a critical point, especially since the Central Valley Region Water Quality Control Board would like to know just how compliant Donner Summit PUD can be!

Diana Messina, Senior Engineer
Central Valley Region Water Quality Control Board
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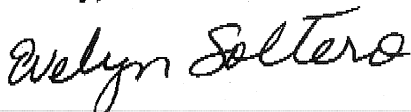
RE: Donner Summit PUD Wastewater Treatment Plant Tentative Waste Discharge Requirements and Tentative Cease and Desist Order comments

Comment 3: There are limited ways to dispose of effluent, most of them disagreeable on one level or another. Therefore, choosing the least disagreeable method at all times would appear to be a prudent choice. Given this rationale, most parties would agree that discharging effluent, no matter how treated, into the river during peak summer and fall months, is not the desirable method. I am requesting that Donner Summit PUD be prohibited from discharge to the river when land disposal is feasible (June- October) based upon the following logic:

- a) Donner Summit PUD is only prohibited from South Yuba river discharge for 60 days. This is a crucial point to illustrate, for this regulation simultaneously ignores and restricts the greater feasibility of land disposal during summer months. July is a month of high public use on the South Yuba River. It is also a month of historically little snow in or around Soda Springs (Donner Summit PUD's discharge point). Recent hydrology data also shows extremely low river flows in July. It is not uncommon for June and October to be free of snow for most of the month. Citing the potential for avoiding river discharge during peak months and the noted relatively snow-less months mentioned, a longer period of land disposal appears logical. I do understand Donner Summit PUD could request a special release permit if they deemed it necessary to discharge during these months. Please consider the logical benefits of land disposal versus river discharge during drier months, especially given Donner Summit PUD may request a special release permit as needed.

Thank you for the opportunity to review and comment on the Donner Summit PUD Wastewater Treatment Plant Tentative Waste Discharge Requirements and Tentative Cease and Desist Order. Please feel free to contact me to discuss these comments or if you have further questions.

Sincerely,



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